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11 *Counsel for Debtor*

12 **UNITED STATES BANKRUPTCY COURT**

13 **DISTRICT OF NEVADA**

14 In re

15 Case No. BK-S-23-10423-MKN

16 CASH CLOUD, INC.,
 17 dba COIN CLOUD,

18 Chapter 11

19 Debtor.

20 **REPLY TO ENIGMA SECURITIES
 21 LIMITED'S RESERVATION OF RIGHTS
 22 WITH RESPECT TO OMNIBUS MOTIONS**

23 Hearing Date: March 17, 2023

24 Hearing Time: 9:30 a.m.

25 Estimated Time for Hearing: 20 Minutes

26 Cash Cloud, Inc. (“Cash Cloud” or “Debtor”), debtor and debtor in possession in the above-
 27 captioned chapter 11 case (the “Chapter 11 Case”), by and through its undersigned counsel, Fox
 28 Rothschild LLP, respectfully submits this reply (the “Enigma Reply”) to the Enigma Securities
 Limited’s Reservation Of Rights With Respect To Omnibus Rejection Motions (“Enigma
 Response”).

26 In the Enigma Response, Enigma raises two points. First, Enigma asserts “that to the extent
 27 the Court grants the Rejection Motions and the Debtor determines to abandon or surrender any
 28 portion of the Enigma Collateral to Enigma, then Enigma reserves all rights with respect thereto,

1 including but not limited to all rights it may have with respect to (a) the valuation of the Enigma
 2 Collateral, (b) cash contained within any abandoned DCMs (which, for the avoidance of doubt, also
 3 constitutes Enigma Collateral), and (c) the impact of abandonment on the amount of the Enigma
 4 Secured Loan claim.” [ECF 198, para. 3].

5 The Debtor does not take issue with this request and hereby requests that it too shall reserve
 6 all of its rights with respect to Enigma and the Enigma Collateral including without limitation (a)
 7 the valuation of the Enigma Collateral, (b) whether any cash contained in any abandoned DCM is
 8 Enigma’s Collateral, (c) the determination of the Enigma claim including without limitation all
 9 related claims for setoff or damages. The Debtor requests that these reservations of rights and
 10 claims pertain to any other creditors secured by the Kiosks or who have a lease or interest in any
 11 component contained in the Kiosks.

12 Second, Enigma asserts that “the proposed orders attached to the Rejection Motions should
 13 be revised to make clear that, upon abandonment of any property to a secured lender, the automatic
 14 stay shall be deemed lifted to permit the secured lender to foreclose on or otherwise dispose of such
 15 property in accordance with applicable non-bankruptcy law.” [ECF 198, para. 4]. The Debtor
 16 agrees with this requested revision.

17 Dated this 10th day of March, 2023.

FOX ROTHSCHILD LLP

18 By: /s/ Jeanette E. McPherson

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